

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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WALDIMIR CALVA, individually
and on behalf of others similarly situated,

CASE NO.: 1:23-cv-07414-MKB-CLP

Plaintiff,

v.

VLAD FINE CRAFT, INC., a New York
Corporation, and VLAD NIKABADZE,
an individual,

Defendants.

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**PROPOSED ORDER TO
SHOW CAUSE FOR FINAL
DEFAULT JUDGMENT**

Upon the declaration of Nolan Klein, Esq. dated April ____ 2024, and attached exhibits, it is
ORDERED: VLAD FINE CRAFT, INC., and VLAD NIKABADZE appear to show cause before
a motion term of before the Honorable Judge _____, in Courtroom 6F, 225 Cadman
Plaza East, Brooklyn, New York, on _____, at ____ o'clock in the _____ noon thereof, or as soon
thereafter as counsel may be heard why a judgment of default should not be entered pursuant to
Rule 55 of the Federal Rules of Civil Procedure against those Defendants; and it is further

ORDERED that service of a copy of this Order and annexed affirmation and exhibits upon
the Defendants on or before _____ o'clock in the _____ noon on _____, 2024,
by _____, shall be deemed good and sufficient service; and it is further

ORDERED that any opposition by Defendants be filed with this Court on or before _____
o'clock in the _____ noon on _____, 2024; and it is further

ORDERED that any reply papers by Plaintiff be filed with this Court on or before _____ o'clock in the _____ noon on _____, 2024; and it is further

ORDERED that the Defendants are advised that failure to respond to the Order to Show Cause may be grounds for the granting of a default judgment against them, in which event the defendants will have no trial; and it is further

ORDERED that the Plaintiff shall file proof of service of this Order to Show Cause by _____, 2024.

PLEASE TAKE FURTHER NOTICE, Answering papers, if any, shall be served on the undersigned no later than fourteen days after service of the moving papers in accordance with Local Rule 6.1(b), or at such other time as the court may direct.

Dated:

Issued: _____

Honorable Margo K. Brodie
United States Chief Judge

TO:

VLAD FINE CRAFT, INC.
2240 84th Street, Apt. D1
Brooklyn, NY 11214

VLAD NIKABADZE
2240 84th Street, Apt D1
Brooklyn, NY 11214